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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AUGUSTINE CALLEROS, JR.,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal
corporation,

Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO MOTION TO DISMISS
[ECF No. 10]**

(First Request)

Plaintiff Augustine Calleros, Jr. ("Plaintiff") and Defendant City of North Las Vegas ("the City"), by and through their respective counsel of record, stipulate and request that the Court extend the deadline for Plaintiff Augustine Calleros, Jr. to respond to the City's Motion to Dismiss [ECF No. 10] ("the Motion") from the current deadline of January 2, 2024, up to and including January 19, 2024. This is the first request to extend the deadline. In support of this Stipulation and Request, the parties state as follows:

1. Plaintiff Augustine Calleros, Jr. was served with the Motion in this matter on December 18, 2024, rendering its response to the Motion due by January 2, 2024.

1 2. Counsel for both parties have conferred regarding Plaintiff's request for an extension of
2 time due to the response deadline falling right after the holidays, and Defendant's counsel has indicated
3 she has no objection to this request.

4 3. Plaintiff's counsel represents that this request is being brought in good faith and is not
5 sought for any improper purpose or other purpose of delay. Plaintiff's counsel represents that this
6 request is brought to provide Plaintiff's counsel with sufficient time to review and respond to the
7 Motion in light of the response deadline falling on January 2, 2024, right after the Christmas and New
8 Year's Day holidays.
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10 4. This stipulation is being filed after the expiration of the deadline. Plaintiff's counsel
11 represents that excusable neglect exists for filing this stipulation after the expiration of the deadline
12 because Plaintiff's counsel is currently recovering from surgery and on medical leave until January 10,
13 2024, and her leave caused a delay in the preparation and filing of this stipulation.
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WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff Augustine Calleros, Jr. to respond to the City's Motion, up to and including January 19, 2024.

DATED this 9th day of January, 2024.

Respectfully submitted,

MELANIE HILL LAW PLLC

/s/ Melanie Hill

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Respectfully submitted,

CITY ATTORNEYS' OFFICE
CITY OF NORTH LAS VEGAS

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Attorney for Defendant City of North Las Vegas

IT IS SO ORDERED *nunc pro tunc*.

Dated this 10 day of January, 2024.


UNITED STATES DISTRICT COURT JUDGE